

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

JEAN ROUX,)	
)	
Plaintiff,)	
)	
vs.)	Case No.
)	
CONVERGENCE ACQUISITIONS, LLC and)	St. Louis County Circuit Court
MONARCH RECOVERY MANAGEMENT,)	Case No: 17SL-AC04769
INC.,)	
)	JURY TRIAL DEMANDED
Defendants.)	

NOTICE OF REMOVAL

COMES NOW defendant Monarch Recovery Management, Inc., by and through its undersigned counsel, and for its Notice of Removal, states as follows:

1. On February 20, 2017, plaintiff Jean Roux commenced a civil action in the St. Louis County Circuit Court captioned *Jean Roux v. Convergence Acquisitions, LLC and Monarch Recovery Management, Inc.* (“Monarch”), Case No. 17SL-AC04769 (hereinafter the “State Court Action”). No further proceedings before the State Court have occurred.
2. Pursuant to 28 U.S.C. §§ 1441 and 1446, Monarch hereby removes the State Court Action to this Court, which is the federal judicial district in which the State Court Action is pending.
3. The Complaint in the State Court Action asserts claims which must be brought under the Fair Debt Collection Practices Act (“FDCPA”), 15 U.S.C. § 1692, *et seq.*

4. Removal of the State Court Action is proper under 28 U.S.C. § 1441. If the action had originally been brought in this Court, this Court would have original, federal question jurisdiction over plaintiff's FDCPA claims per 15 U.S.C. § 1692k.
5. Monarch was served with summons and the State Court Action Complaint on March 15, 2017. This Notice of Removal is filed within 30 days of receipt of the State Court Action Complaint by Monarch and is therefore timely filed under 28 U.S.C. § 1446(b).
6. A copy of all process, pleadings and orders filed in the State Court Action is being filed with this Notice and is attached hereto as Exhibit A.

WHEREFORE, defendant Monarch Recovery Management, Inc. removes this matter from the St. Louis County Circuit Court on this 31st day of March, 2017.

/s/Michael S. Hamlin

Michael S. Hamlin #52972MO
PITZER SNODGRASS, P.C.
Attorney for Defendant
Monarch Recovery Management
100 South Fourth Street, Suite 400
St. Louis, Missouri 63102-1821
(314) 421-5545
(314) 421-3144 (Fax)
Email: hamlin@pspclaw.com

Copy of the foregoing mailed this 31st day of March, 2017 to:

Mr. Dominic M. Pontello
Pontello Law, LLC
406 Boone's Lick Road
St. Charles, Missouri 63301
Attorney for Plaintiff

/s/Michael S. Hamlin